

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**JACKIE TIDWELL,**

**Plaintiff/Petitioner,**

**-vs-**

**NOTICE OF WAL-MART  
STORES, INC.'S  
CROSS-MOTION TO VACATE  
THE ENTRY OF DEFAULT  
ENTERED IN THE SDNY'S  
CLERK'S OFFICE**

**ZHEJIANG JIANDI TRADING & INDUSTRIAL  
CO., LTD.,**

**CIVIL ACTION NO. 1:13-cv-05701**

**Defendant/Respondent,**

**and**

**TV PRODUCTS USA, INC., WALMART STORES,  
INC., BIG LOT STORES, INC.,**

**Garnishees.**

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**SUBMITTED BY:**

Brown & Hutchinson  
T. Andrew Brown, Esq.  
Attorneys for Garnishee  
Wal-Mart Stores, Inc.

**DATE, TIME & PLACE  
OF HEARING:**

Time and Date to be set by Court  
United States District Courthouse  
500 Pearl Street  
New York, New York

**SUPPORTING PAPERS:**

Affirmation of T. Andrew Brown, Esq. dated December 5, 2013, with attached exhibit, Affidavit of Brian Hennelly, Sworn to December 3, 2013 and Memorandum of Law dated December 5, 2013.

**RELIEF DEMANDED:**

An Order granting Wal-Mart Store, Inc.'s Cross-Motion to Vacate the Entry of Default entered in the Southern District of New York's Clerk's office pursuant to FRCP Rule 55(c).

**NATURE OF ACTION:**

Turnover Proceeding.

Dated: December 5, 2013  
Rochester, New York

**BROWN & HUTCHINSON**

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